

RUTH SMITH, Individually and as Widow)
for the Use and Benefit of Herself and the)
Next of Kin of RICHARD SMITH, Deceased,) **Case #: 3:05-00444**
Judge Trauger
Plaintiff,)
-against-)
PFIZER INC., PARKE-DAVIS,)
a division of Warner-Lambert Company)
and Warner-Lambert Company LLC,)
WARNER-LAMBERT COMPANY,)
WARNER-LAMBERT COMPANY LLC and)
JOHN DOE(S) 1-10,)
Defendants.)

**PLAINTIFF'S MOTION *IN LIMINE* TO PRECLUDE ANY
MENTION AT TRIAL BY DEFENDANTS THAT THE NEURONTIN
PACKAGE INSERT WAS LABELED TO WARN AGAINST COMPLETED
SUICIDE PRIOR TO THE DECEMBER 21, 2005 LABELING CHANGE**

Plaintiff Ruth Smith, as the Widow for the use and benefit of herself and the next of kin of Richard Smith, deceased, by and through her undersigned counsel, respectfully requests an order precluding Defendants Pfizer Inc. and Warner-Lambert Company LLC from providing any comment, evidence, testimony, inference or document that the Neurontin package insert was labeled to warn against completed suicide prior to the December 21, 2005 labeling change.

This Motion is supported by Plaintiff's Memorandum in Support, and the Declaration of Kenneth B. Fromson, Esq. and exhibits annexed thereto, submitted herewith.

Dated: April 16, 2010

Respectfully submitted,

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- and -

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BARRETT & ASSOCIATES, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of April, 2010, I electronically filed the foregoing document with the Clerk of the Court, United States District Court for the Middle District of Tennessee, using the CM/ECF system. True and correct copies of the foregoing documents are being served via the Court's CM/ECF system on the following:

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